UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

KATHALEEN FREEMAN, et al.,

Plaintiffs,

-v.-

HSBC HOLDINGS PLC, et al.,

Defendants.

No. 1:18-CV-07359-DLI-CLP

RULE 7.1 DISCLOSURE STATEMENT FOR DEFENDANT STANDARD CHARTERED BANK

Pursuant to Federal Rule of Civil Procedure 7.1, Standard Chartered Bank, by and through its undersigned counsel, discloses that it is a subsidiary of Standard Chartered Holdings Limited, which, in turn, operates as a subsidiary of Standard Chartered PLC, a publicly held company. No publicly held corporation owns 10% or more of Standard Chartered PLC's shares.

Dated: New York, New York March 12, 2019

Respectfully submitted,

/s/ Sharon L. Nelles

Sharon L. Nelles (nelless@sullcrom.com)
Bradley P. Smith (smithbr@sullcrom.com)
SULLIVAN & CROMWELL LLP

Telephone: (212) 558-4000

Facsimile: (212) 558-3588 125 Broad Street

125 Broad Street New York, NY 10004

Attorneys for Standard Chartered Bank